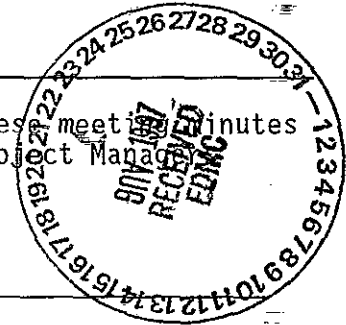


Meeting Minutes Transmittal

CENTRAL WASTE COMPLEX
Project Managers Meeting
2420 Stevens Center, Room 2519
Richland, Washington

June 4, 1997
8:00 a.m. to 12:00 p.m.

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above-dated Project Managers Meeting.



Not Present

Date:

Joseph J. Waring, Project Manager, DOE-RL

Ted A. Wooley

Date:

7/9/97

Ted A. Wooley, Unit Manager, for Laura Cusack, Project Manager,
Washington State Department of Ecology

Anthony G. Miskho

Date:

7/9/97

Anthony G. Miskho, Contractor Representative, FDH

Daniel G. Saueressig

Date:

7/9/97

Daniel G. Saueressig, Permitting Representative, RFSH

Central Waste Complex, RFSH Concurrence.

Kent M. McDonald

Date:

7/9/97

Kent M. McDonald, Contractor Representative, RFSH

Purpose: Discuss permitting process.

Meeting Minutes are attached. The minutes are comprised of the following:

- Attachment 1 - Agenda
- Attachment 2 - Summary of Discussion and Commitments/Agreements
- Attachment 3 - Attendance List
- Attachment 4 - Action Items
- Attachment 5 - Hanford Facility Central Waste Complex Draft Part B
Proposed Workshop Schedule
- Attachment 6 - Regulatory Position Paper
- Attachment 7 - Notice of Deficiency Response Table with Agreements/Actions
Resulting from Part B Workshop

Attachment 1

CENTRAL WASTE COMPLEX
Project Managers Meeting
2440 Stevens Center, Room 2519
Richland, Washington

June 4, 1997
8:00 a.m. to 12:00 p.m.

AGENDA

1. PREVIOUS MEETING MINUTES

2. PROGRAM STATUS

- Phase V - Project W-112 Status (R. Ames - RFSH)

3. PERMIT APPLICATION STATUS

- Part B NOD Workshop Schedule (D. Saueressig- RFSH)

4. BUDGET TOPICS

- FY97 Budget Status (D. Saueressig - RFSH)

5. GENERAL TOPICS

- Past Action Items

3-21-96:3 Check to see if there is some type of
quantifiable criteria by which CWC personnel
determine whether a spill is major or minor.
ACTION: Mr. Miskho

OPEN

5-31-96:2 RFSH will provide Ecology (Mr. Wooley) the
comparison between the unit specific BEP versus
the Hanford Contingency Plan(s) at the next PMM.
ACTION: Mr. Miskho

OPEN

11-12-96:1 Mr. Wooley, (Ecology) will provide Mr. McKarns
(DOE-RL), Mr. Saueressig (RFSH) and Mr. Miskho
(FDH) an outline of the detail he is requesting
to be included in the Building Emergency Plan.
ACTION: Mr. Wooley

OPEN

11-12-96:2 Mr. Miskho will determine a course of action in an effort to provide a Building Emergency Plan to meet Ecology's approval.
ACTION: Mr. Miskho

OPEN

12-11-96:1 Mr. Barnes (RFSH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC.
ACTION: Mr. Barnes

OPEN

03-26-97:1 Mr. McDonald (RFSH) will provide Mr. Wooley (Ecology) the guidance information regarding process knowledge that is being applied to the 1200 drums being received at CWC from 224-T TRUSAF.
ACTION: Mr. McDonald

CLOSED

- New Action Items

6. SCHEDULE NEXT MEETING

- Tentative Date

7. PART B WORKSHOP

Attachment 2

CENTRAL WASTE COMPLEX Project Managers Meeting 2440 Stevens Center, Room 2519 Richland, Washington

June 4, 1997
8:00 a.m. to 12:00 p.m.

Summary of Discussion and Commitments/Agreements

1. PREVIOUS MEETING MINUTES

The May 1, 1997 Project Manager Meeting (PMM) minutes were approved, with the exception of DOE-RL, who was not represented at this meeting.

2. PROGRAM STATUS

- Phase V - Project W-112 Status

Mr. R. Ames (RFSH) reported that the Project W-112 internal readiness review has been completed, and a letter has been sent to DOE-RL stating that RFSH is ready to operate following completion of a few actions. DOE-RL initiated its readiness review yesterday (6-3-97), and the review will continue through the week. The parties are still on schedule to start up both buildings by the end of June 1997.

3. PERMIT APPLICATION STATUS

- Part B NOD Workshop Schedule

Mr. D. Saueressig (RFSH) distributed a workshop schedule (Attachment 5). Mr. Saueressig noted that Chapter 8 (training plan) may need to be moved to a later date in the workshop schedule. Mr. T. Wooley (Ecology) stated that his approach to revision of the training plan will be as a unit-specific document.

Mr. Wooley inquired about progress regarding revision of the Waste Analysis Plan (WAP). Mr. Saueressig responded that RFSH plans to begin revision of the WAP by the end of June 1997.

4. BUDGET TOPICS

- FY97 Budget Status

Mr. K. McDonald (RFSH) stated that the funding for the CWC Part B Permit Application for FY '97 is in place. Planning for FY '98 has been initiated.

5. GENERAL TOPICS

- Past Action Items

3-21-96:2, Check to see if there is some type of quantifiable criteria by which CWC personnel determine whether a spill is major or minor.

This action item was left open.

5-31-96:2, RFSH will provide Ecology (Mr. Wooley) the comparison between the unit specific BEP versus the Hanford Contingency Plan(s) at the next PMM.

This action item was left open.

11-12-96:1, Mr. Wooley, (Ecology) will provide Mr. McKarns (DOE-RL), Mr. Saueressig (RFSH) and Mr. Miskho (FDH) an outline of the detail he is requesting to be included in the Building Emergency Plan.

This action item is open.

11-12-96:2, Mr. Miskho will determine a course of action in an effort to provide a Building Emergency Plan to meet Ecology's approval.

This action item was left open.

12-11-96:1, Mr. Barnes (RFSH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC.

This action item is open.

03-26-97:1, Mr. McDonald (RFSH) will provide Mr. Wooley (Ecology) the guidance information regarding process knowledge that is being applied to the ~1200 drums being received at CWC from 224-T TRUSAF.

Mr. McDonald provided the information during the 5-1-97 PMM (Attachment 6), closing this action item.

- New Action Items

There were no new action items.

Mr. Saueressig initiated a brief discussion regarding the conversion of an interim status or permitted treatment, storage, and/or disposal (TSD) unit to a 90-day accumulation area. A regulatory position paper was distributed (Attachment 6), which provides an analysis of the regulatory requirements for the conversion. Mr. Wooley agreed to review Attachment 6 and provide a response in a timely manner. The parties agreed to include this item as a topic for discussion at the next PMM.

6. SCHEDULE NEXT MEETING

- Tentative Date

The next PMM was scheduled for July 9, 1997, in Richland, Washington. A Notice of Deficiency workshop will follow the PMM.

- Proposed Topics

The proposed conversion of an interim status or permitted TSD unit to a 90-day accumulation area will be added to the agenda for the July 9, 1997 PMM.

7. PART B WORKSHOP

The remainder of the meeting was dedicated to resolving specific comments on the Part B Permit Application for the CWC. Attachment 7 contains the Notice of Deficiency Response Table with the specific comments that were addressed.

Attachment 3

CENTRAL WASTE COMPLEX
Project Managers Meeting
2440 Stevens Center, Room 2519
Richland, Washington

June 4, 1997
8:00 a.m. to 12:00 p.m.

Attendance List

Name	Organization	Phone #
Ted Wooley	Ecology	736-3012
Mike Ciminera	GSSC	946-3681
Randy Ames	RFSH	373-2067
Kathy Knox	Knox Court Reporting	946-5535
Dan Saueressig	RFSH	376-9739
Kent McDonald	RFSH	373-4981
Norm Emerson	RFSH	372-0828
Larry Olsen	RFSH	376-8737
Tony Miskho	FDH	376-7313
Paul Macbeth	GSSC	372-2289

Attachment 4
CENTRAL WASTE COMPLEX
Project Managers Meeting
2440 Stevens Center, Room 2519
Richland, Washington

June 4, 1997
8:00 a.m. to 12:00 p.m.

Action Items

<u>Action Item #</u>	<u>Description</u>
3-21-96:3	Check to see if there is some type of quantifiable criteria by which CWC personnel determine whether a spill is major or minor. ACTION: Mr. Miskho (FDH) OPEN
5-31-96:2	RFSH will provide Ecology (T. Wooley) the comparison between the unit specific BEP versus the Hanford Contingency Plan(s) at the next PMM. ACTION: Mr. Miskho (FDH) OPEN
11-12-96:1	Mr. Wooley (Ecology) will provide Mr. McKarns (DOE-RL), Mr. Saueressig (RFSH) and Mr. Miskho (FDH) an outline of the detail he is requesting to be included in the Building Emergency Plan. ACTION: Mr. Wooley (Ecology) OPEN
11-12-96:2	Mr. Miskho (FDH) will determine a course of action in an effort to provide a Building Emergency Plan to meet Ecology's approval. ACTION: Mr. Miskho (FDH) OPEN
12-11-96:1	Mr. Barnes (RFSH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC. ACTION: Mr. Barnes OPEN
03-26-96:1	Mr. McDonald (RFSH) will provide Mr. Wooley (Ecology) the guidance information regarding process knowledge that is being applied to the 1200 drums being received at CWC from 224-T TRUSAF. CLOSED

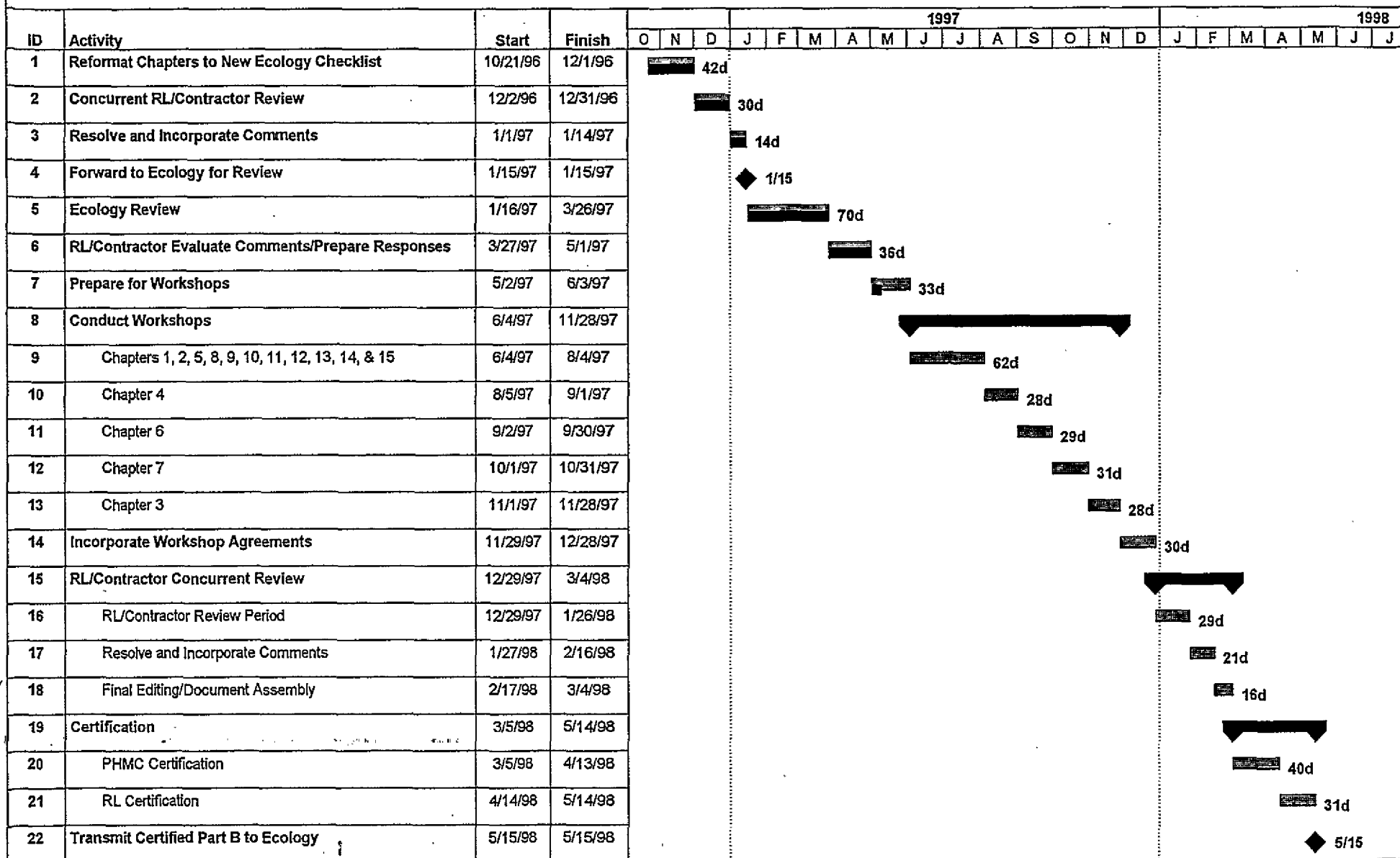
Attachment 5

CENTRAL WASTE COMPLEX
Project Managers Meeting
2440 Stevens Center, Room 2519
Richland, Washington

June 4, 1997
8:00 a.m. to 12:00 p.m.

HANFORD FACILITY PERMIT
CENTRAL WASTE COMPLEX
DRAFT PART B PROPOSED WORKSHOP SCHEDULE

Hanford Facility Permit Central Waste Complex Draft Part B Proposed Workshop Schedule



File: CWC-WK01.MPP
Date: 6/2/97
Permitting Lead: DG Saueressig

Summary Activities Completed
Activities Milestone

Attachment 6

CENTRAL WASTE COMPLEX
Project Managers Meeting
2440 Stevens Center, Room 2519
Richland, Washington

June 4, 1997
8:00 a.m. to 12:00 p.m.

REGULATORY POSITION PAPER

REGULATORY POSITION PAPER

Converting a Permitted or Interim Status treatment, storage, and disposal unit to a 90-Day Accumulation Area

May 29, 1997

INTRODUCTION

This position paper will present and analyze the regulatory requirements for converting a portion of the existing treatment, storage, and disposal (TSD) unit boundary of the Central Waste Complex (CWC) to a "90-day accumulation area." Specifically, the 2401-W storage building and a portion of the land around this structure. Attachment 1 contains a schematic of the 2401-W storage building. Attachment 2 contains a CWC site plan that identifies the "proposed 90-day accumulation area" within the confines of the CWC TSD unit boundary.

REGULATORY PATHWAY

The below text is from the U.S. Environmental Protection Agency (EPA) FAXBACK 13774 (EPA: 530-R-96-002A). The below documents the EPA's position on converting a treatment, storage, and disposal unit, or a portion thereof, to a 90-day accumulation area.

"Conversion of Permitted or Interim Status Units to Generator Accumulation Units

A treatment, storage, or disposal facility (TSDF) stores hazardous waste in permitted storage units. The owner or operator wishes to convert some of the permitted storage units into generator 90-day accumulation units used to manage wastes that are generated on site. What requirements must the owner or operator comply with before a permitted unit may operate as a generator 90-day accumulation unit?

Generally, an owner or operator removing a unit from the jurisdiction of a RCRA permit must first close the unit in accordance with all of the applicable closure provisions for permitted units. In this case, since the converted units will continue to store hazardous waste, conversion will not trigger closure requirements because the unit will not have received its final volume of hazardous waste [40 CFR 264.113(a)]. Once the unit receives waste for the last time, the owner or operator must comply with the more stringent permitted closure provisions in 40 CFR Part 264 (Subpart G and the unit specific closure provisions), rather than the closure provisions for generator accumulations units referenced in 40 CFR 262.3(a). In addition, the owner or operator must maintain financial assurance pursuant to Part 264, Subpart H, until closure of the unit is complete (57 FR 37254; August 18, 1992). To indicate that hazardous waste management activities in the converted unit are no longer covered by the facility's permit, the facility must submit the appropriate permit modification.

Owner or operators converting interim status units to 90-day accumulation units also need not begin final closure until after the final receipt of hazardous waste [40 CFR Part 265.113(a)]. Upon final closure, the owner or operator must comply with the interim status closure provisions in Part 265 (Subpart G and the unit specific closure provisions). As with permitted TSDFs, the owner or operator of interim status facilities must maintain financial assurance pursuant to Part 264, Subpart H, until final closure is completed."

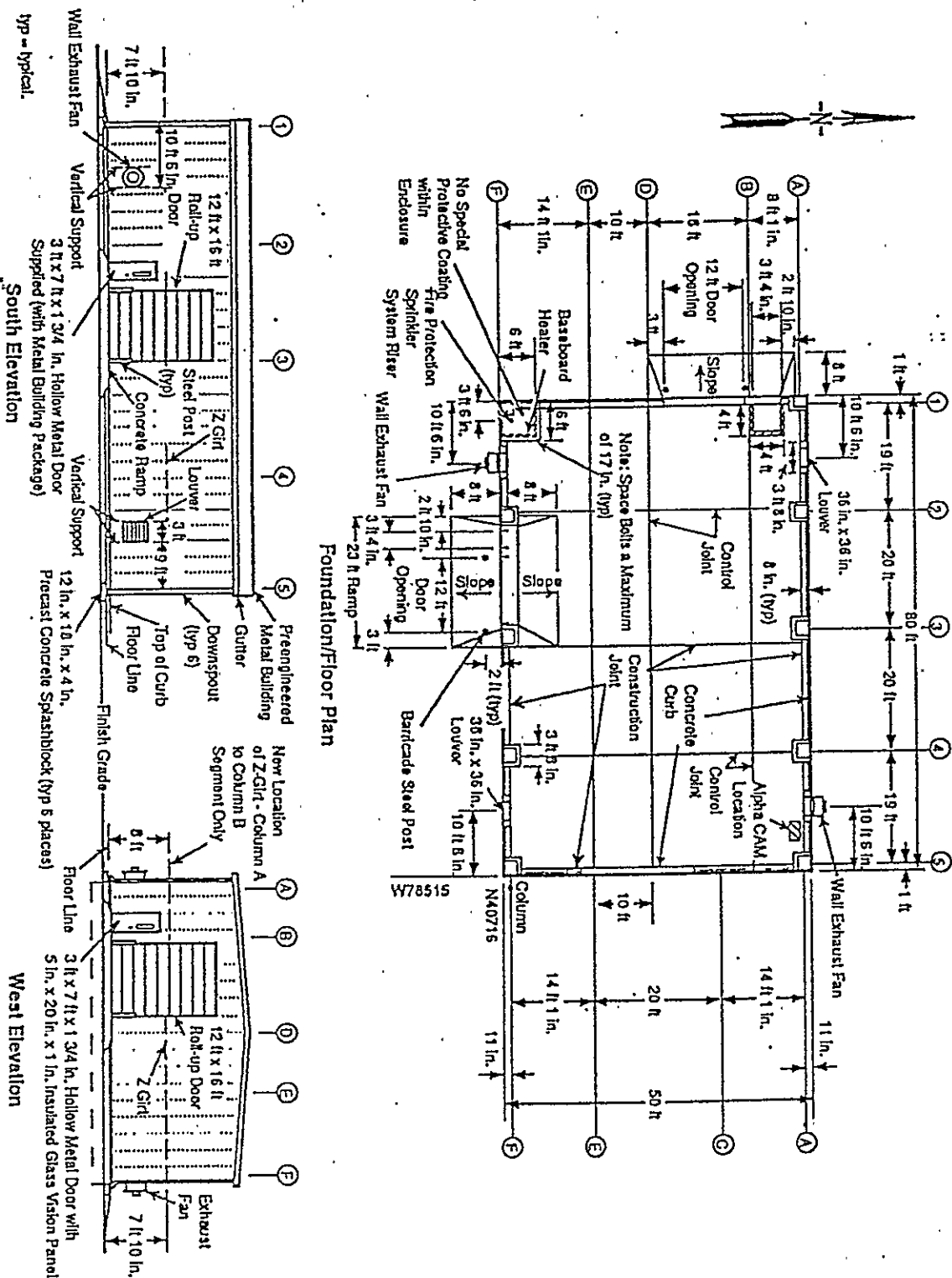
CONCLUSION

The above EPA position on this subject clearly identifies an acceptable "regulatory pathway" for converting a TSD unit to a 90-day accumulation area, from a federal perspective. The above EPA position will need to be agreed to by the Washington State Department of Ecology before serious efforts are initiated to convert the 2401-W storage building to a 90-day accumulation area. In addition, a revision of the Dangerous Waste Permit Application, Part A, Form 3, for the CWC will be necessary to reflect the new TSD unit boundary including potential removal of the 2401-W. NOTE: the extent of revision depends upon agreements reached with Ecology. In addition, procedures, safety analysis report, etc., will have be revised and/or developed to address 90-day accumulation waste management operations.

ATTACHMENT 1
SCHEMATIC OF THE
2401-W STORAGE BUILDING

Plutonium/Polychlorinated Biphenyl Mixed Waste Storage Building (2401-W)

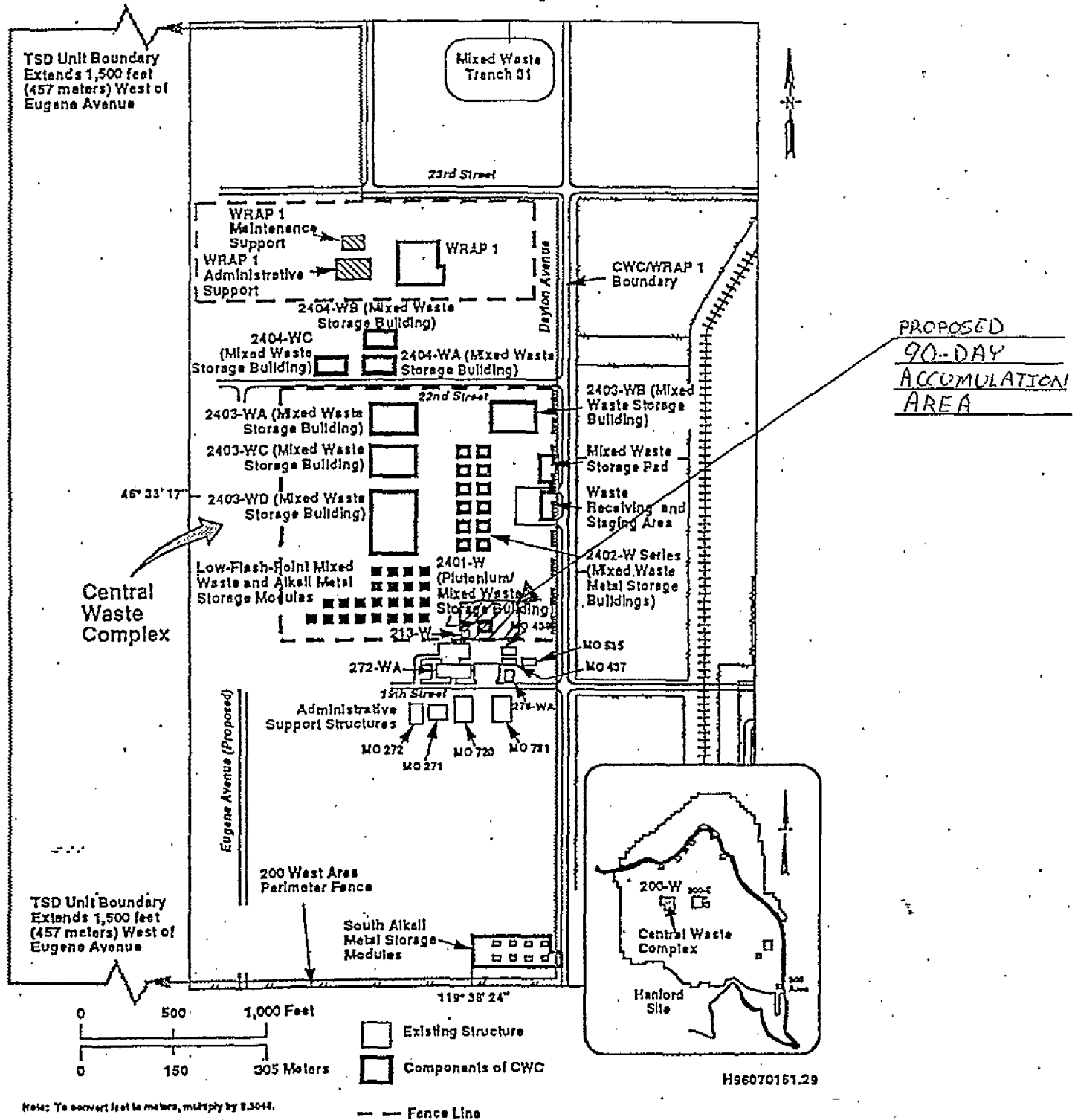
Plan and Elevations



ATTACHMENT 2

CENTRAL WASTE COMPLEX SITE PLAN
IDENTIFYING 90-DAY ACCUMULATION AREA

Central Waste Complex Site Plan



Attachment 7

CENTRAL WASTE COMPLEX
Project Managers Meeting
2440 Stevens Center, Room 2519
Richland, Washington

June 4, 1997
8:00 a.m. to 12:00 p.m.

NOTICE OF DEFICIENCY RESPONSE TABLE
WITH AGREEMENTS/ACTIONS RESULTING
FROM PART B WORKSHOP

Hanford Facility Dangerous Waste Permit Application,
Central Waste Complex DOE/RL-91-17 WD2
Notice of Deficiency Table No. 1

No.	Comment/Requirement
-----	---------------------

- | | |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. | <p><u>Page 1-1, line 17.</u> <u>Comment:</u> It is not clear why the Part A, form 3s for the Central Waste Complex (CWC) and Waste Receiving and Processing (WRAP) were combined.</p> |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Requirement: Clarify this part of the discussion.

DOE-RL/FDH Response: They are not combined, and were split into two separate Form 3's on January 25, 1995 (Revision 3). Originally the Hanford Central Waste Complex (Hanford CWC) Part B included the Radioactive Mixed Waste Storage Facility (now known as CWC), and the Waste Receiving and Processing Modules 1, 2A, and 2B. The TPA identified two Part B's for this one unit, and two distinct milestones for submittal of the Radioactive Mixed Waste Storage Facility Part B (Milestone M-20-05) and the Waste Receiving and Processing Module 1 [Module 2A and 2B to be included as revisions to the WRAP Part B (Milestone M-20-12)]. A decision was made to separate the Part A into two separate Part A's to match the Part B's.

CLOSED (6/4/97)

- | | |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2. | <p><u>Page 1-1, line 20.</u> <u>Comment:</u> Ecology's review of the most recent CWC Part A, form 3, REV 3 against REV 4 did not identify an additional 23 waste codes. Please identify which codes were added. If REV 4, dated 10/01/96, is not the most current CWC Part A, the U.S. Department of Energy (USDOE) will need to resubmit the currently active Part A and, if there are significant changes, re-certification may have to take place.</p> |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Requirement: Explain how the addition of 23 waste codes was justified and to which Part A revision.

DOE-RL/FDH Response: The 23 additional dangerous waste numbers were added to Revision 3 of the Part A, Form 3. Comparison of Revision 2 against Revision 3 will identify waste numbers that were added. No comments were received from Ecology on Revision 3, therefore Revision 3 was approved. As the Washington Administrative Code (WAC) 173-303 is revised, dangerous waste numbers are added and/or deleted from the regulations. Therefore, when the Part A was revised, these dangerous waste numbers were either added or deleted to reflect the current revision of WAC 173-303. Revision 4 (included in this draft permit application) is the most current version and was submitted when the Project Hanford Management Contract was awarded to Fluor Daniel Hanford, Inc.

OPEN PENDING REVIEW OF REVISION 2 VERSUS REVISION 3 (6/4/97)

3. Page 2-1, Section 2.0. Comment: Ecology's Dangerous Waste Permit Application Requirements document, sections B-1a(2) and (3) have not been addressed. Items, such as a detailed flow diagram description of the dangerous waste management operations and any Dangerous Waste Regulations regarding "treatment by generator," are missing from this section.

Requirement: Review the permit application requirements, as referenced above, and revise the Part B accordingly.

DOE-RL/FDH Response: ~~Per the Ecology Part B checklist [B-1a(2)], this information is referenced and discussed in Chapters 3.0 and 4.0 and Appendix 3A per the Ecology Part B checklist [B-1a(2)] guidance that duplicate information is not required. This draft permit application was developed before the Waste Analysis Plan (WAP) guidance was finalized.~~ The WAP will be revised before the next submittal to incorporate the guidance. Treatment by generator activities are outside the scope of this permit application.

OPEN PENDING REVIEW OF CHAPTERS 3 AND 4 AND DISCUSSION ON POINT OF GENERATION (E.G., SPILL CLEANUP [POG: y], REPACKAGING [POG: ?], AND MOVEMENT OF CONTAINERS [POG: N]) (6/4/97)

4. Page 2-1, line 51. Comment: The sentence beginning with, "The floor accommodates a 908-Kg forklift ... and an approximate 1000, container equivalent load, depending on the waste management criteria," is confusing. What is a 1000 container equivalent load? Also, what does discussion on floor load capacity have to do with waste management criteria?

Requirement: Please revise\clarify this sentence with the above questions being the basis for revision.

DOE-RL/FDH Response: A 1,000 container equivalent load is equivalent to 1,000 208-liter containers full of water. For example, using the weight of water, which is approximately 1 kilogram per liter, therefore, a 208-liter container could weigh as much as 208 kilograms, when multiplied by 1,000, you arrive at a

1,000 container equivalent load of 208,000 kilograms, which these storage buildings are rated for. With regards to the 908 kilogram forklift, this discussion is for informational purposes only. The only intent behind the statement commented on is to demonstrate that the floor is capable of accommodating a given waste load in conjunction with waste handling equipment.

CLOSED (6/4/97) - THE TEXT OF SECTION 2.1.1 HAS BEEN MODIFIED AS FOLLOWS: "The floor accommodates a 908-kilogram forklift and an approximate 1,000 container equivalent load, ~~depending on waste management criterion~~ not to exceed the floor loading limit of. ~~The floor loading is limited to 0.22 kilogram per square centimeter.~~"

5. Page 2-2, line 22. Comment: What type and magnitude of module modification does it take to facilitate modification of the Part A. As the text reads now, there could be a lot of changes to the modules with little or no revision to the CWC Part A.

Requirement: Provide further information on the process.

DOE-RL/FDH Response: Correct. The CWC is constructed and continues to accommodate construction for the addition of storage locations as waste management needs dictate. The Part A description allows for the flexibility to modify existing storage locations without a revision. The process design capacity identified in Section III.B.1. of the Part A is large enough to accommodate any new storage locations without an increase, however, the Part A would be revised whenever new storage locations outside the TSD unit boundary are identified as being needed.

OPEN PENDING FURTHER REVIEW (6/4/97).

6. Page 2-3, line 9. Comment: Please see comment/requirement #4 above.

DOE-RL/FDH Response: Refer to response to comment 4.

CLOSED (6/4/97) - SAME RESPONSE AS COMMENT 4.

7. Page 3-1, Section 3.1. Comment: Although the reference to the Dangerous Waste Application Requirements is correct, the section does not fulfill the prescribed elements laid out in C-1 and C-1(a). C-1(a) stipulates the following: "Include the identity and concentration of all constituents and physical properties"

Requirement: Clarify how the text presented in section 3.1 meets the elements of C-1 and C-1(a).

DOE-RL/FDH Response: This draft permit application was developed before the WAP guidance was finalized. The WAP will be revised before the next submittal to incorporate the guidance.

8. Page 3-1, line 14. Comment: This sentence identifies mixed waste as being the only type of waste that can be stored in CWC. Does this mean there is absolutely no "non-mixed" dangerous waste currently stored at CWC?

Requirement: Provide information to answer the above question.

DOE-RL/FDH Response: The CWC can accept any type of waste, however, for the purpose of this Part B, mixed waste and only the dangerous waste portion of that mixed waste (excluding radionuclides) is subject to Ecology regulation. The CWC also can store low-level waste and transuranic waste and this waste is not subject to Ecology regulation. The CWC mission supports these waste management activities. This draft permit application was developed before the WAP guidance was finalized. The WAP will be revised before the next submittal to incorporate the guidance.

9. Pages 4-1, line 48. Comment: This paragraph does not mention "state only" waste codes WSC2 and W001. Is this list meant to be comprehensive or not?

Requirement: Please explain why the two waste codes mentioned above are not listed under section 4.1.1.1.

DOE-RL/FDH Response: Accept, dangerous waste numbers WSC2 and W001 will be added.

10. Page 4-1, line 46. Comment: The text indicates that marking and labeling requirements are discussed in chapter 3.0, Where?

Requirement: Please identify where these instructions are specifically found in chapter 3.

DOE-RL/FDH Response: Accept. Text will be added.

11. Page 4-2, Section 4.1.1.2. Comment: Requirement D-1c, although referenced, is not met in this section. Container Labeling is not discussed anywhere in this section.

Requirement: Please clarify where labeling is described in this section, or where it can be found in the Part B. If it is not currently in the Part B, please add it, pursuant to requirement D-1c.

DOE-RL/FDH Response: Accept. Text will be added.

12. Page 4-2, line 41. Comment: This section is incomplete. The secondary containment calculations (as noted in Appendix 4C) are not yet available. This requirement must be met during interim status, just as it would be required in final status.

Requirement: Provide these calculations as soon as possible. The Part B cannot be approved without these calculations completed and inserted into the document.

DOE-RL/FDH Response: The secondary containment calculations were included in Revision 0. These calculations are currently being converted to metric per a DOE-RL direction, and will be provided when completed.

13. Page 4-3, line 27. Comment: How can sections 4.1.2.2 and 4.1.2.3 be completely accurate if the secondary containment calculations, as noted in comment #12, are not complete?

Requirement: Explain how discussions provided in sections 4.1.2.2 and 4.1.2.3 are valid without the appropriate calculations completed.

DOE-RL/FDH Response: Refer to response to comment 12. Once the secondary containment calculations are converted to metric, the sections referencing these calculations will be verified.

14. Page 4-4, line 10. Comment: How visually accessible are the trench drains? Can an accurate assessment of the volume contained by the trenches be made?

Requirement: Describe in more detail the visual accessibility of the storage pad trenches.

DOE-RL/FDH Response: The trenches are covered with a grate, the grate has holes, and this grate provides for ocular verification. This verification allows for an estimate of the trench volume to be determined.

15. Page 4-4, line 21. Comment: In what building is the logbook kept and what type of release would facilitate a change to the logbook.

Requirement: Please provide answers for the above questions.

DOE-RL/FDH Response: The logbook usually is kept at M0-288 (on the waste receiving and staging area). Any release is recorded in the logbook regardless of quantity.

16. Page 4-5, line 26. Comment: Who is responsible for developing a sampling and analysis plan for the wipe sampling events?

Requirement: Revise document to include more detail on the development and implementation of the sampling plan.

DOE-RL/FDH Response: There is no sampling plan for the cleanup of spills. Procedures are in place to clean up spills and to verify the adequacy of the cleanup. Sampling plans are prepared for closure activities, but are not required by WAC 173-303 for spill cleanup.

17. Page 4-6, line 32. Comment: This sentence is somewhat confusing. The Part A describes solidification of free liquids as a treatment process performed at CWC, yet free liquids are only looked for under specific instructions. Does this mean there is a potential for free liquids to be stored at CWC? If so, how does the Part A reflect this. Of the drums that are stored long term, what percentage of the total drum volume can contain free liquid?

DOE-RL/FDH Response: The CWC meets all regulatory requirements (WAC 173-303) to store free liquids. The Part B will be written to reflect this operating flexibility. Current waste acceptance criteria limit liquids from 1 to 3 nineteen liter leak resistant containers overpacked in a container that contains twice the absorbent amount of material needed to absorb the liquid.

18. Page 4-7, line 16. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(1). The following direction is given: "Provide sketches, drawings, or data that containers of reactive waste exhibiting a characteristic specified in WAC 173-303-090(7)(vi), (vii) or (viii) are stored in a manner equivalent . . . ," but is not indicated in the text currently in the permit application.

Requirement: Explain why all of the information identified in D-1f(1) is not provided in section 4.3.1. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will be considered as unfulfilled.

DOE-RL/FDH Response: Per the Ecology Part B checklist, this section will be evaluated against what is required by applicable WAC 173-303 regulations.

19. Page 4-7, line 23. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(2). The following direction is given: "Provide sketches, drawings, or data demonstrating that container storage of ignitable waste and reactive waste." Requirements listed in section D-1f(2) go beyond what the permit language currently includes.

Requirement: Explain why all of the information identified in D-1f(2) is not provided in section 4.3.2. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will be considered as unfulfilled.

DOE-RL/FDH Response: Per the Ecology Part B checklist, this section will be evaluated against what is required by applicable WAC 173-303 regulations.

20. Page 4-7, line 32. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(2). The following direction is given: "Through sketches, drawings, and/or data demonstrate that a container holding a dangerous that is compatible with any waste . . ." Requirements listed in section D-1f(3) go beyond what the permit application language currently includes.

Requirement: Explain why all of the information identified in D-1f(3) is not provided in section 4.3.3. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will consider as unfulfilled.

DOE-RL/FDH Response: Per the Ecology Part B checklist, this section will be evaluated against what is required by applicable WAC 173-303 regulations.

21. Page 6-2, line 8. Comment: Section F-2 in the requirements is actually entitled, "Inspection Plan," not "Inspection Requirement." What process does CWC have that would be considered equivalent?

Requirement: Explain how WAC-173-303-806 (4)(a)(v), -303-320, -303-340, 40CFR 270.14, and 264.15 are being met within this section, or even within the permit application.

DOE-RL/FDH Response: This information is contained in Sections 6.2.1, 6.2.1.1, 6.2.1.2, 6.2.2, 6.2.3 and 6.2.3.1 and 6.2.3.2.

22. Page 6-2, line 24. Comment: There is no apparent attempt in this section to meet requirement F-2a(1).

Requirement: Please review the elements identified in F-2a(1) and describe how these are met with the permit application.

DOE-RL/FDH Response: The Ecology Part B checklist is guidance and not everything contained is required by the regulations.

23. Page 6-2, line 24. Comment: It would be helpful to get a copy of a blank inspection checklist, in order to better understand what is actually looked for on a standard inspection

Requirement: Please provide a copy.

DOE-RL/FDH Response: Checklist is available at the TSD unit and one will be provided. However, the checklist will not be included in the Part B as inclusion is not required by WAC 173-303.

24. Page 6-3, Line 35. Comment: F-2c(1)(c) requires specifying actual timelines for taking corrective action. Line 35 of Section 6.2.2 of the permit application defers discussion of the timeline to the BEP (appendix 7a). The BEP does not indicate a timeline for corrective action.

Requirement: Revise either section 6.2.2 and/or the BEP pursuant to F-2c with regard to all spill types. Please emphasize timeline for corrective actions and positions responsible for taking corrective action or ensuring other staff remedy the problems. If this information is already available, please identify where it exists. Further discussion on adequacy of the information with regard to regulatory requirements will most likely be necessary.

DOE-RL/FDH Response: The Ecology Part B checklist is guidance and not everything contained is required by the regulations.

25. Page 6-4, line 15. Comment: This section refers the reader to section 6.2.2, which refers the reader to the BEP for corrective actions other than spills to secondary containment. As discussed in comment #24, the BEP does not adequately address corrective action schedules.

Requirement: Please see requirement #24 with focus on F-2d(1)(b)(i) and (ii).

DOE-RL/FDH Response: Refer to response to comment 24.

26. Page 7-1. Comment: Currently, Ecology is having internal discussions on whether the combination of unit specific BEP and Attachment 4 of the Hanford Facility Permit (DOE/RL 91-28) plus other documents, such as, the plant operating procedures and WHC-CM-4-43 actually make up an effective "overall contingency plan." The main questions Ecology has at this time is: (1) When do USDOE and contractors actually consider the BEP implemented, and (2) what does that mean in terms of reporting requirements? Additional NODs will results from that discussion.

Requirement: Please prepare for future discussions on how the combination of all of the documents actually fulfill requirements pursuant to WAC 173-303-350.

DOE-RL/FDH Response: No response required. Answers to questions will be developed during future discussion with Ecology.

27. Page 10-1. Comment: There is no mention of intent to meet 40 CFR 264.75(h) and (I) requirements. A quick review of DOE/RL-97-16, the Hanford Site Annual Dangerous Waste Report, indicates some deficiencies. Generator identification is lacking in most cases and there is no mapping of waste location as required in 40 CFR.

Requirement: Review the federal requirements. Revision of -97-16 or Section 10 of the permit application will be necessary.

DOE-RL/FDH Response: This text has been agreed to by Ecology and is reflected in the *Hanford Dangerous Waste Permit Application, General Information Portion* (DOE/RL-91-28), Chapter 10.

OPEN (6/4/97) - RFSH WILL PROVIDE ECOLOGY A COPY OF WASTE MINIMIZATION PLAN FOR SOLID WASTE AND A COPY OF THE ANNUAL REPORT THAT IS GIVEN TO THE WASTE MINIMIZATION GROUP. TONY MISKHO WILL PROVIDE ADDITIONAL INFORMATION TO THE DOE-RL/FDH RESPONSE.

28. Page 11-2 line 1. Comment: Reference to the background document will require updating. A cross-reference to the appropriate contractor will be necessary, unless some portions of Westinghouse Hanford still exist. If WHC 1991a is the relevant document then Ecology concurrence should have occurred and been documented, or use of it for permitting activities may not be appropriate. Also, sampling requirements imposed by WAC-173-340, as implemented by WAC-173-303, must be considered in corrective action.

Requirement: Revise the permit application to correctly reference the site background document and verify Ecology approval of the document. Also, add the reference to WAC-173-340.

DOE-RL/FDH Response: Refer to the *General Information Portion* (DOE/RL-91-28), Chapter 11.0. The correct sampling methods are identified in SW-846. It is anticipated that the CWC will be clean closed and, therefore, corrective action will not be required. Reference to WHC 1991a will be removed.

CLOSED (6/4/97) - THE TEXT WAS REVISED AS FOLLOWS: "The CWC will be considered clean when the sampling of the structures and the surrounding soil shows that the concentrations for all constituents of interest are present at concentrations at or below the appropriate background or regulatory thresholds as discussed in the General Information Portion (DOE/RL-91-28, Chapter 11.0, Section 11.1.1.1).—Soil background levels will be based on established and accepted Hanford Site soil background information (WHC 1991a) or established by soil sampling per SW-846 (EPA 1986)."

29. Page 11-2 line 11. Comment: There is no mention of providing Ecology with a sampling and analysis/decontamination plan as part of the closure requirements. Although this may be implied, it makes sense to actually identify this as a major deliverable prior to implementing closure activities.

Requirement: Revise section 11.1.2 to include an Ecology approved the SAP/decon plan as a preclosure deliverable. The format will be based on the most current Ecology guidance (current to the year that CWC is actually closed).

DOE-RL/FDH Response: The CWC is not anticipated to be closed for a number of decades. When the CWC does close, the current regulatory requirements for development of a closure plan will be followed/submitted.

CLOSED (6/4/97) - THE TEXT WAS MODIFIED AS FOLLOWS: "~~Any sampling and analysis activities required for clean closure will be accomplished in accordance with a sampling and analysis/decontamination plan that meets the requirements in place at the time of closure. Closure will entail random sampling of the soil surrounding the storage and loading areas to verify that no contaminants above background or regulatory thresholds are present at the time of closure. Additionally, authoritative samples will be taken as necessary based on information available at the time of closure.~~"

30. Page 13-1. Comment: WAC-173-340 will require referencing. Also, as stated in the requirements list, all permits applied for or received from any regulatory agencies.

Requirement: Please revise the permit application to meet this requirement under Section J.

DOE-RL/FDH Response: This text has been agreed to by Ecology and is reflected in the *General Information Portion* (DOE/RL-91-28), Chapter 13.0.

OPEN (6/4/97) - ALL FEDERAL AND STATE LAWS APPLICABLE TO THE CWC FROM DOE/RL-91-28 WILL BE LISTED IN CHAPTER 13.0. DESCRIPTION OF THE APPLICABLE LAWS WILL BE REFERENCED TO 91-28.

31. Page APP 3A-i. Comment: A detailed set of NODs on the Waste Analysis Plan (WAP) for CWC will be submitted by Ecology in the coming weeks. There are still some outstanding issues on the WAP guidance that need resolution.

Requirement: An agreement of when Ecology will provide NODs on the WAP will be discussed as part of the work shop schedule at the next project managers meeting.

DOE-RL/FDH Response: A CWC WAP addressing the guidance developed during the workshops with DOE-RL, FDH/RFSH, and Ecology will be developed.

32. Page APP 4C-i. Comment: When will secondary containment calculations be available? The part B cannot be approved prior to having the calculations.

Requirement: Please give a date.

DOE-RL/FDH Response: Refer to response to comment 12. Secondary containment calculations will be provided by July 31, 1997.

33. Page APP 4D-i. Comment: There is no information on how durable the sealant is in terms of reaction to chemical spills and physical damage from drum movement. MSDS information, although necessary, does not whether the sealant is appropriate for the application it is being used for.

Requirement: Revise the permit application, adding the requested information.

DOE-RL/FDH Response: Although the regulations do not require the installation of a protective coating over the concrete floors, this added protection for the concrete exceeds what is required by the regulations. The MSDS's provide general physical and chemical descriptions of the coatings.

34. Page APP 7A-i. Comment: Ecology is not prepared to give a complete set of NODs on the BEP because of current internal discussions.

Requirement: A date will be set for submittal of BEP NODs. NODs were submitted in January 1996 which, at a minimum, will require completed resolution. Additional NODs will be dependent on the outcome of Ecology discussions.

DOE-RL/FDH Response: No response required. Answers to questions will be developed during future discussions with Ecology.

35. Page APP 8A-i. Comment: There is no reference to Section H the Dangerous Waste Application Requirements document, Why?

Requirement: To be consistent and to have the correct focus on training requirements, please reference Section H.

DOE-RL/FDH Response: Section H is complied with by directing the reader in Chapter 8 to Appendix 8A. Appendix 8A contains the Solid Waste Disposal training plan. This training plan is included in the 616 Nonradioactive Dangerous Waste Storage Facility (616 NRDWSF) Permit, which has been accepted by Ecology, and included in the HF RCRA Permit, Part III, Chapter 1.

36. Page 12, 1st para. under bullets. Comment: What happens with personnel who cannot pass the training requirements. Are they restricted from doing related work?

Requirement: Please clarify how training deficiencies are handled.

DOE-RL/FDH Response: Personnel are retested and/or provided with additional instruction. If the personnel cannot pass the required tests necessary to perform his/her job, this individual is (1) not allowed to perform this particular job or (2) is allowed to perform the job, but under close supervision (this depends on the hazards associated with the job).

37. Page 13, 1st sentence. Comment: Define exempt personnel.

Requirement: For clarification purposes, please define which positions are considered exempt.

DOE-RL/FDH Response: Refer to the Fair Labor Standard Act of 1964. This term does not infer that an employee does not have to meet specific requirements, but refers to how the human resources organization manages payroll.

38. Page 15, Section 5.11. Comment: How long is a person allowed to remain in the remedial training program, and what work restrictions are imposed on them during this time?

Requirement: Please answer questions.

DOE-RL/FDH Response: Remedial training program is determined by the individual's immediate manager/supervisor. Remedial training programs generally do not exceed 6 months; however, this is up to the immediate manager/supervisor.

39. Page A-1, 1st para. Comment: What process is in place for determining what type of training applies to a specific position?

Requirement: Clarify how this determination is made.

DOE-RL/FDH Response: This is an ongoing process. Any changes in operations are evaluated and a determination is made if additional, reduced, or no change is required. Personnel are then trained accordingly based on this ongoing evaluation.

40. Page A-2, Training Matrix. Comment: This table is confusing.

Requirement: Part of a project managers meeting will be devoted to discussion on how to use the table.

DOE-RL/FDH Response: No response required. Answers to questions will be developed during future discussions with Ecology.

41. Page A-12, Category G. Comment: The 40 hour and 16 hour Hazardous Waste Operations Training is considered "Non-RCRA," why?

Requirement: Clarify how this is categorized as "Non-RCRA."

DOE-RL/FDH Response: This training is required by OSHA and 29 CFR 1910.120 and not the dangerous waste regulations. This is Health and Safety training and not waste management training.

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